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**BY ECF**

Honorable Margo K. Brodie  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**RE: United States v. Daniel Capaldo, et al.,**  
**19 Cr. 442 (ILG)**  
**EXTENSION REQUEST OF EMERGENCY BAIL APPLICATION COVID-19**

Honorable Judge Brodie:

I am writing to request on behalf of Mr. Capaldo that the Court's Order of March 30, 2020, releasing him under conditions due to the COVID-19 Pandemic, be continued for a reasonable time at the Court's discretion. Mr. Capaldo has been in full compliance with all of the Court's conditions since his release.

I respectfully request for permission to renew this application before the expiration of this extension, if granted by the Court.

Thank you for your attention to this matter.

Respectfully submitted,

*Peter Guadagnino*

Peter Guadagnino, Esq.

Attorney for Daniel Capaldo

cc: A.U.S.A. Elizabeth Geddes